

IN UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

---

IN RE APPLICATION OF THE )  
UNITED STATES OF AMERICA FOR )  
A CRIMINAL COMPLAINT AND AN )  
ARREST WARRANT FOR )  
MANUEL OPPENHEIMER )

---

Case Number: 3:20-mj-119

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND AN ARREST**

**WARRANT**

I, Alexander Hirst, being first duly sworn, hereby depose and state as follows:

**AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since June 2014. As such, I am a “Federal Law Enforcement Officer” of the United States. I am currently assigned to the Charlotte Division, Violent Crimes Against Children Program and am designated to work a variety of criminal matters, including child sexual exploitation, Internet crimes against children, and human trafficking. As part of my duties, I investigate violations of federal law, including the online exploitation of children, particularly in relation to violations of Title 18, United States Code (USC), Sections 2251, 2252 and 2252A which criminalize, among other things, the production, advertisement, possession, receipt, accessing with intent to view and transportation of child pornography.

2. Your Affiant submits that there is probable cause to believe that on or about April 16, 2020, in the Western District of North Carolina, MANUEL OPPENHEIMER (“Defendant”), of Brooklyn, New York, did travel in interstate commerce with a motivating purpose of engaging

in illicit sexual conduct, as defined in 18 United States Code Section 2423(f), with another person, all in violation of Title 18, United States Code, Section 2423(b).

3. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is sufficient probable cause for the requested Warrant and does not set forth all of my knowledge about this matter.

### **PROBABLE CAUSE**

4. On April 16, 2020, Union County Sheriff's Office completed a missing person report. The relative of a 14-year-old female victim reported the victim had run away and was possibly in Charlotte with a 26-year-old adult male, later identified as the defendant. The relative was able to research the victim's call log via an "AT&T app" and identify the victim's possible location. Charlotte-Mecklenburg Police Department ("CMPD") responded to an address in Charlotte, North Carolina where the victim and the defendant were located. The victim was subsequently transferred to Union County.

5. On April 17, 2020, Union County Sheriff's Office alerted the CMPD Central Division the victim disclosed she had sexual intercourse with the defendant at the address in Charlotte, North Carolina. The victim was taken to the hospital for a sexual assault examination.

6. CMPD Detectives spoke with the victim who disclosed penile-vaginal penetration with the twenty-six (26) year old male, defendant, a few hours earlier on April 16, 2020, in Charlotte. The victim stated that the incident occurred in the bedroom of an "Airbnb" rented by the defendant..

7. The victim reported she met the defendant on "Omegle," a free online chat website, and communicated using her phone. The defendant's contact information was saved in her phone under a "ring emoji".

8. After the victim's initial disclosure to Union County, CMPD patrol officers returned to the incident address. The patrol officers obtained consent to search the apartment from the defendant. The defendant agreed to voluntarily speak with detectives at the Law Enforcement Center in Charlotte NC 28202.

9. The defendant was interviewed and admitted having first met the victim on Omegle before beginning to talk to her on Snapchat, which is a mobile native app which allows users to securely share messages, photos, and videos. The defendant stated that he and the victim would "role play" that she was 14 or 15 years old and he was an older guy. During the course of the Snapchats the victim sent a picture of herself in her underwear to the defendant. This is the only picture the defendant saved on his phone, and this picture was shown to the CMPD detectives.

10. The defendant, who advised that he lived in Brooklyn, New York, stated he and the victim decided to meet now because of the COVID outbreak, otherwise they might have to wait a year before the outbreak ended. The defendant advised that he traveled from New York to Charlotte on April 16, 2020 to meet with the victim.

11. The defendant initially denied having sex with the victim, and stated that the victim's relative and the police were both calling him for several hours before the victim arrived at his AirBnB. The defendant acknowledged that the police and victim's relative told him that the victim was only 14 years old. Nonetheless, the defendant advised that later in the night, the defendant sent a Lyft to pick the victim up from Union County and bring her to Charlotte.

12. After agreeing to give a buccal swap for DNA to CMPD detectives, the defendant admitted that he and the victim engaged in vaginal penile sex. According to defendant, this occurred after defendant had been informed by numerous times by police and the victim's relative that the victim was only fourteen years old. According to the defendant, he and the victim were only together for about five minutes.

13. Based on this information, there is probable cause to believe the defendant traveled in interstate commerce for the purpose of engaging in illicit sexual conduct with another person, to with: knowingly engaging in a sex act with a child between the ages of 12 and 14 when the defendant is more than four years older.

### **CONCLUSION**

14. Based on the foregoing, your Affiant submits this Affidavit which supports probable cause for a Warrant to arrest MANUEL OPPENHEIMER for having violated Title 18, United States Code, Section 2423(b), which prohibits a person to travel in interstate commerce with the purpose of engaging in any illicit sexual conduct.

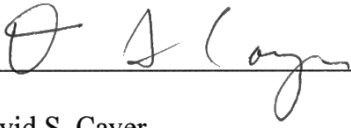
---

Alexander Hirst  
Special Agent - FBI  
Affiant

Sworn before the undersigned this the \_27th\_ day of April 2020.

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 27th day of April, 2020, at 3:45 p.m.

Signed: April 27, 2020



---

David S. Cayer  
United States Magistrate Judge

